

Privacy Policy RADR

RADR B.V.

Latest update: December 2018

Privacy Policy

Who are we and what do we do?

We are RADR B.V., acting under the name RADR (further mentioned as “**RADR**”, “**we**” or “**us**”). You can find our contact information at the bottom of this Privacy Policy. RADR is a friend-based city & travel app (the “**App**”) focused on the LGBTQ+ friendly and open minded-community. In the App you can list and review your favourite spots that are LGBTQ+ friendly and open-minded and welcoming to all. Your “**Reviews**” will be shared with us and if you opt to also with your friends from Facebook who are also registered on RADR (hereafter also: “**your RADR Friends**”). Because we believe Reviews are best when created by friends, you will only see Reviews from your own RADR Friends. RADR itself also adds tips that are visible to all users, so you may also find reviews even if your RADR Friends haven’t left any yet. You can find more information about us and our services (“**Services**”) on our website: www.radr.app (the “**Website**”), or on the mobile application offered under the name RADR.

Privacy and relevant legislation

We care about your privacy. We comply with the new General Data Protection Regulation (“**GDPR**”),¹ which replaced the various privacy laws in European Member States as of 25 May 2018. We also comply with the Dutch Telecommunications Act (*Telecommunicatiewet*, **DTA**). Said legislation will be referred to hereinafter as the “**Relevant Legislation**”.

In this Privacy Policy we explain which Personal Data we collect through our Website, App and Services. We also explain for which purposes we use Personal Data, how we secure them and for how long we store them. At the bottom of this Privacy Policy we explain what rights you have with regard to your Personal Data and how you can exercise these rights.

Personal Data

In this Privacy Policy, “**Personal Data**” means any information by which you can be, directly or indirectly, identified as a natural person. This definition is in accordance with the Relevant Legislation.

Are you under the age of eighteen?

If you are younger than eighteen years old, you are not allowed to use our Website, App and Services. Such because the Relevant Legislation provides strict rules on the Personal Data of minors.

Which Personal Data do we collect and for which purposes do we use them?

We may collect various sorts of Personal Data when you use our Website, App and/or Services. In the scheme below we describe what Personal Data we collect and for which purposes. We also explain about the connection between RADR and the social network platform Facebook.

(Personal) Data	Purpose(s)
General Information: Name, profile picture (through the Facebook connection);	We use: - your name so your we can address you personally; - your name and profile picture in order to show that a certain Review is posted by you – which will however only be visible to your RADR Friends (your Facebook-friends that are also using RADR). Your RADR Friends are able to repost your Review through their own account, and their RADR Friends also can repost it, and so on. To protect your privacy however, we ensure that your identity is removed in reposts. In other words: your review may go viral but not your identity. Your identity is only visible to your RADR Friends. We however caution you that if you include Personal Data in the review (e.g. by adding pictures of yourself or others), we cannot prevent that this Personal Data is spread by re-posts. We therefore advise you not to include Personal Data in your Review; - your name and profile picture to prevent fraud and/or misuse of our Services.

¹ <http://eur-lex.europa.eu/legal-content/NL/TXT/PDF/?uri=CELEX:32016R0679&from=en>.

<p>Social media information:</p> <p>Your friend list and your mail-address (through the Facebook connection).</p>	<p>We use</p> <ul style="list-style-type: none"> - your Facebook friend list in order to determine who your RADR Friends are (your Facebook-friends that are also using RADR), and to enable you and your RADR Friends to see each other's Reviews; - your mail-address will be used to send you a welcome mail and information and updates about RADR. Based on your (optional) consent we may also send you information about topics that might be interesting for you through a newsletter.
<p>Location information:</p> <p>Your GPS-location as provided by your device.</p>	<p>We use:</p> <ul style="list-style-type: none"> - your location, based on your (optional) consent, to prioritize the reviews around you. In this way you easily see the closest-by reviews added by your RADR Friends or RADR.
<p>Electronic identifiers:</p> <p>The type of your browser/device and what version, what operating system you use, your IP address and/or which internet service provider provides your connection.</p>	<p>We use:</p> <ul style="list-style-type: none"> - these electronic identifiers in order to adapt our Website, App and/or Services to your browser and device. Next to that, it enables us to communicate with you in a language you speak and to show you content that relates to the country you reside in. We may also use Electronic identifiers in order to prevent fraud and/or misuse of our Services.

Facebook-connection

Your account on RADR may be established through a connection with your profile on the social media platform Facebook. This enables us to see which of your Facebook-friends are also using RADR (your RADR Friends). We believe recommendations from friends are the best, and this connection enables you to see Reviews from your RADR Friends, whereas your Reviews are (only) visible to your RADR Friends. If you want to make use of this option, you need to register for RADR through your Facebook profile, whereby Facebook supplies us with several categories of Personal Data (as further clarified above) necessary for rendering you our Services.

Our App enables you to also share your Review on your Facebook profile. Please note that we cannot control the spread and circulation of a Review and/or your Personal Data when you decide to share a Review on your Facebook profile. In order to ensure that your Reviews are not shared on Facebook without your intention, we have included a switch-box in the review-process called "Share on Facebook". This switch-box is turned off by default.

Notwithstanding the above, Facebook processes your Personal Data according to their own Privacy Policy which we don't control. If you don't want Facebook to send us your Personal Data, you can change this through the privacy settings in your Facebook profile under [settings > Apps and Websites](#).

On the basis of which legal grounds do we process your Personal Data?

There are several grounds from the Relevant Legislation on the basis of which we are allowed to process your Personal Data:

- **Performance of the contract:** We process your name, Facebook profile picture and mail-address in order to provide you our Services.
- **Consent:** We process your friend list and mail address from Facebook based on your consent. This permission can easily be withdrawn through your profile on Facebook under [settings > apps and websites](#). You can separately withdraw your consent for the newsletter through an unsubscribe-link provided in each newsletter. We also process your GPS-location based on your optional consent. This permission can be withdrawn through the settings of your mobile device.
- **Legitimate interest:** It is in our legitimate interest to process your electronic identifiers, as we can hereby improve our services. We may also process Personal Data on this ground for the prevention of fraud and/or misuse of our Services.
- **Legal obligation:** We are required to store certain general information and payment data in our records for Tax Authorities.

How do we protect your Personal Data?

We work hard to protect your Personal Data from unauthorized or unlawful access, alteration, disclosure, use or destruction. We inter alia take the following technical and organizational measures to protect your Personal Data:

- Secure network connections with Secure Socket Layer (SSL) technology or a technology that is similar to SSL;
- The access to the data within our company is limited to the persons that need the data (need-to-know-basis);
- Back-ups of the data;
- Employee confidentiality statements;
- NDAs and appropriate Data Processing Agreements with third parties who (sub)process the data on our behalf;

How long do we store your data?

It is our policy to only store and process Personal Data that is essential in providing you with the best service possible. We keep the Personal Data as long as we need them for the purposes stated above.

All Personal Data that we process within the context of your account will be stored for a period of 2 years after your last login. If your account has been inactive for almost 2 years, we will send you a notification about this and remove your account and Personal Data if your account remains inactive.

In case you delete your account, we will also delete your Personal Data, unless it regards Personal Data that we need to process on the basis of a legal obligation and/or a legitimate interest.

Do we share your Personal Data with others?

RADR does not sell, trade or rent Personal Data to third parties. We do make use of “**Data (sub)Processors**” to assist us in our Services. Within this context these Data Processors receive Personal Data from us which they process by our order. By means of “**Data Processing Agreements**” we contractually obligate all the Data Processors we work with, not to process the Personal Data for any other purpose than as instructed by us.

The Data Processors we use for the processing of Personal Data are, among others, Appworks, PINCH and Transip. They inter alia take care of the storage of the data. These Data Processors are required to follow our instructions strictly. They will, therefore, only receive the data that is relevant for their services and will be obliged not use the Personal Data for their own purposes.

International transfer of Personal Data

We may transfer Personal Data outside the EU, if one of our Data Processors is established outside the EU. The Personal Data will only be transmitted to countries and/or parties offering an adequate level of protection which meets the European standards. We will e.g. check whether an organization outside the EU is listed in the Privacy Shield List and/or whether the level of protection of the third country has been approved by the European Commission. To learn more about the Privacy Shield Program, see [here](#).

Transfer of data outside the EU will always be in accordance with the Relevant Legislation (see Chapter 5 of the GDPR).

Third-party websites

You may find (hyper)links on our Website which link to the websites of partners, suppliers, advertisers, sponsors, licensors or other third parties. We don't control the content or links which appear on these websites and we are not responsible for the practices of websites linked to or from our Website. Furthermore, these websites, including their content and links, may constantly change. These websites may have their own privacy policies, user terms and customer policy. Browsing and interaction on any other website, including websites which are linked to or from our Website, fall outside the scope of our Terms and Conditions and Privacy Policy.

Cookies

We use cookies on the Website to enhance your experience when you use our Services. A cookie is a simple small text file that can be stored on your computer or device, when you visit the Website. This text file identifies your browser and/or device. When you revisit our Website, the cookie ensures, for instance, that our Website recognizes your browser and/or device computer.

We use the following types of cookies:

Technical cookies: Technical cookies are essential to the operation of our Website. They allow you to navigate through our Website and to use the functions incorporated in it.

Analytical or statistical cookies: Analytical cookies are used to check the quality and effectiveness of the Website. For instance, we can see how many users visit the Website and which pages are visited. We use this information to improve our Website and Services.

If you don't want cookies to be sent to your computer, you can change this in the cookie settings of your browser. Please note that some of the functions or services of our Website may not operate, or not so well, without cookies.

Amendments to this privacy policy

We aim at constantly improving our Website, App and Services. That is why from time to time we can update this Privacy Policy. If we change our Privacy Policy in a significant way, we will state so on our Website and our App together with the reviewed Privacy Policy. We may also notify before using our Service that our Privacy Policy has been updated. You need to agree to the updated Privacy Policy before you can continue to use our Website and App.

Your rights

In relation to your Personal Data, you have the following rights:

- You may request access to the Personal Data we process about you;
- You may request us to correct, update, shield or delete your Personal Data in our records. In the event of fraud, misuse of our services, or other wrongful act, we may keep a record of you in order to prevent you to continue using our Website, App and/or Services;

- You may request a copy of the Personal Data we have processed about you. We can also send this copy – at your request – to another data controller, so you don't have to send the data yourself;
- You may file a complaint against processing your data;
- You may file a complaint with your National Data Protection Authority, if you are under the impression that we process your Personal Data unlawfully. In the case of the Netherlands this is the Autoriteit Persoonsgegevens which you can contact through [their website](#). See [here](#) a list of all National Data Protection Authorities in the European Union;
- You may always withdraw your consent to process your Personal Data. From the moment you withdraw your Consent, we will cease processing the Personal Data which we processed on the basis of your consent.

Please note that you can also view, edit or delete your Personal Data by logging in to your personal account on RADR or through your Facebook profile under [settings > Apps and Websites](#).

If you want to exercise your aforementioned rights or when you have any questions, comments or concerns regarding the manner in which we handle your Personal Data, please contact us through the contact information below. We will do our best to respond to any of the above requests within 30 days.

Contact information

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